

EXHIBIT D

C. ROBERTS CONSULTING ENGINEERS, INC.

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Charles C. Roberts, Jr. Ph.D., P.E.

PRELIMINARY ANALYSIS OF A 2000 PONTIAC GTP

Insured: Ronald Shipka Enterprises

Claim Number: Seneca 9CCN001

REPORT TO:

Mr. Joe Mazzone

mazzoneinvestigation@prodigy.net

Mazzone & Assoc.

8150 West 111th St. Suite 10

Palos Hills IL 60465

Date of Report: March 17, 2009

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INTRODUCTION

An inspection was performed on a 2000 Pontiac GTP located at 1301 W Fletcher in Chicago, Illinois. The purpose of the inspection was to obtain information so that an opinion could be offered on the probable cause of a fire that started in the vehicle. This report details the results of the inspection and an analysis.

INSPECTION

Figure 1 shows various views of the vehicle and the VIN plate. According to the vehicle owner, she parked the car at around 6:30 pm. The fire started at approximately 7pm.

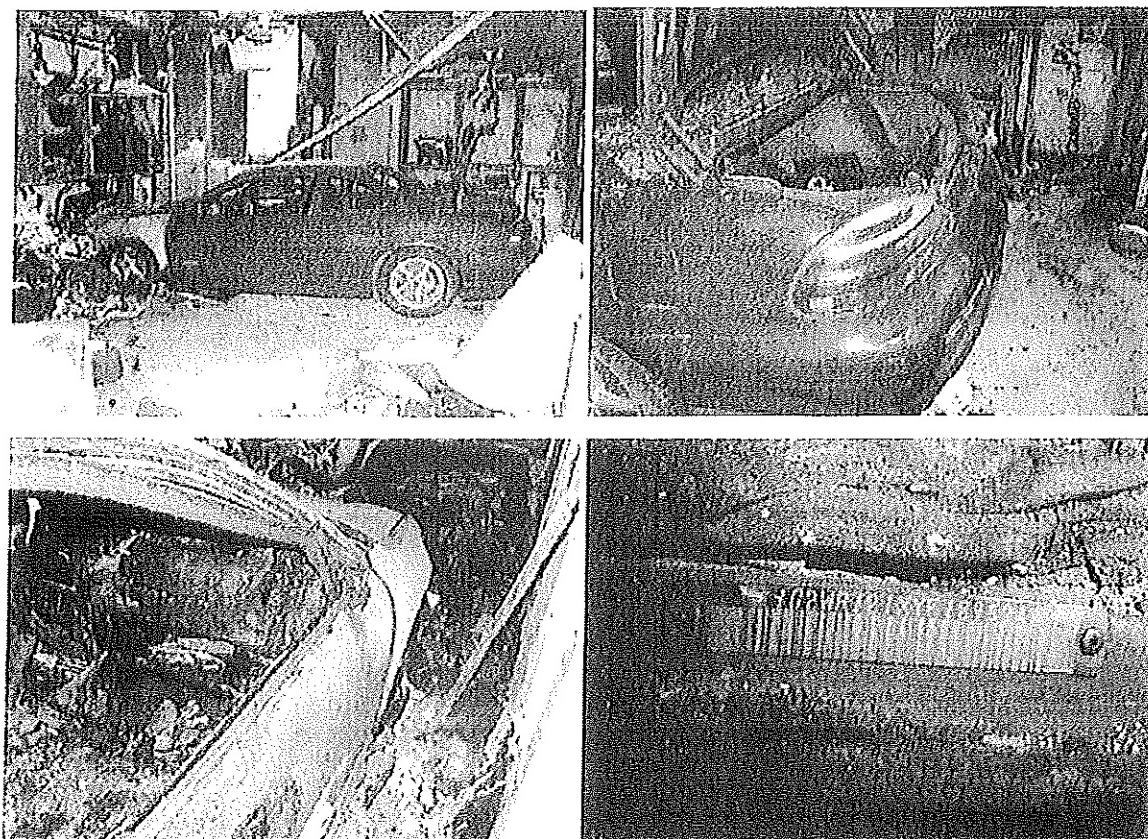


Figure 1

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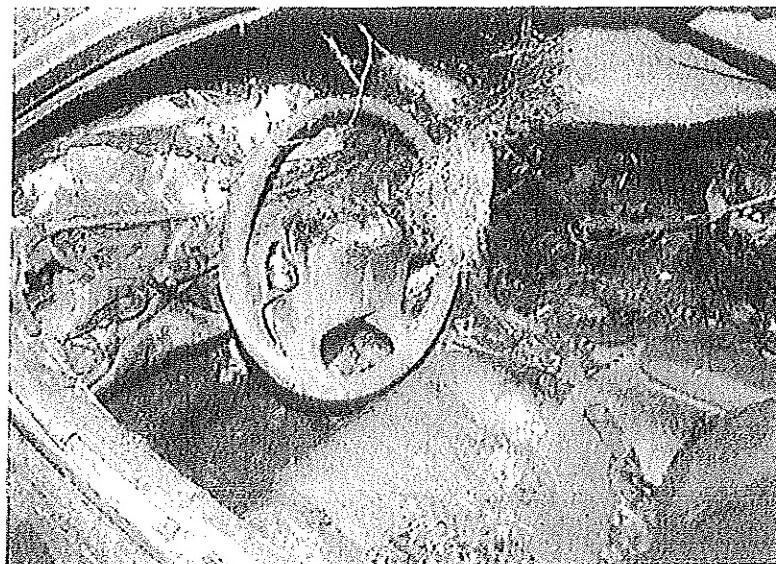


Figure 2

Figure 2 shows the occupant compartment which was in relatively good condition. Figure 3 shows a severely oxidized hood and front fenders, suggesting a fire origin in the engine compartment.



Figure 3

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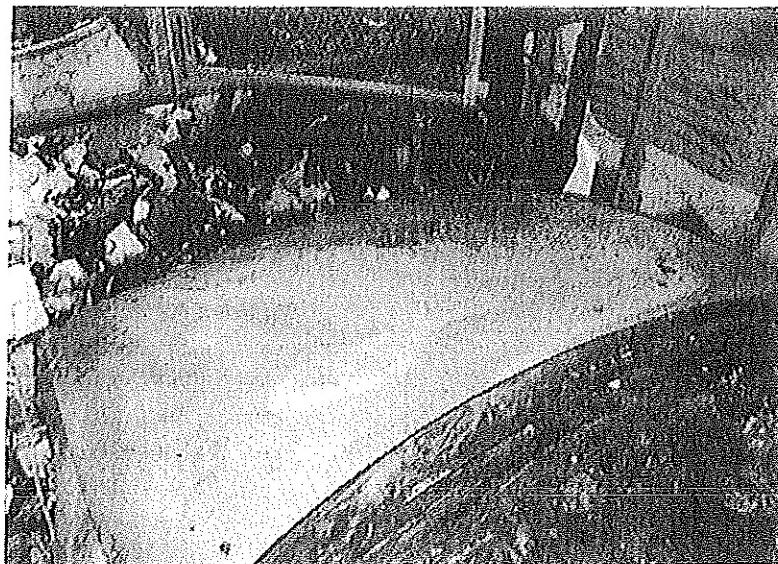


Figure 4

In Figure 4, the highest temperatures appear to be in the engine compartment toward the front of the vehicle. Figure 5 is a view of the front of the engine, showing severe damage.

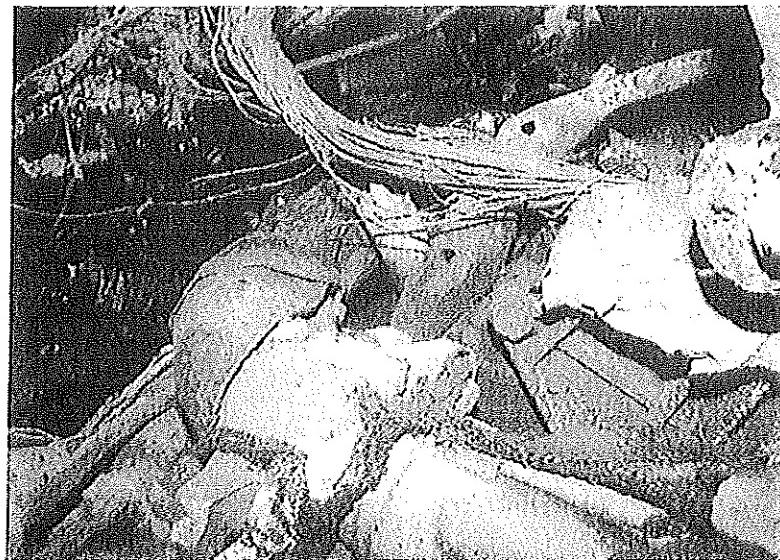


Figure 5

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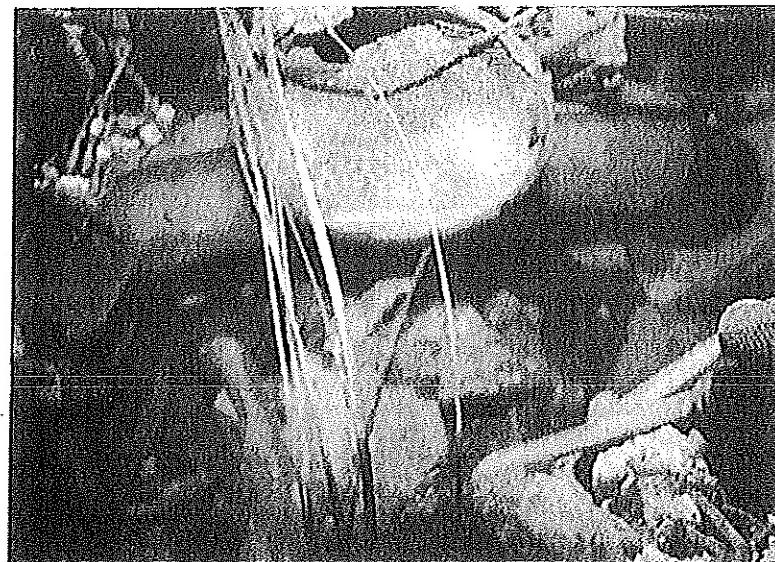


Figure 6

Figure 6 shows the throttle body which is less thermally damaged. Figure 7 shows the badly damaged radiator, suggesting a fire origin near the front of the engine.

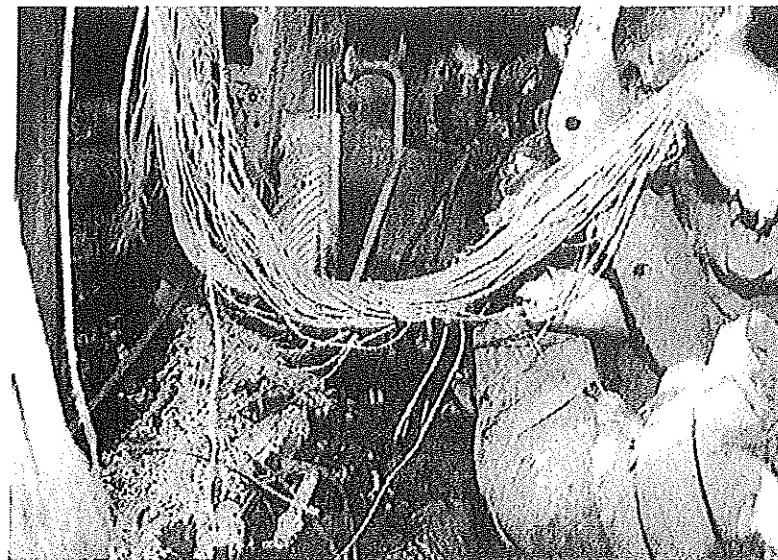


Figure 7

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Recall search on the specific VIN of this vehicle resulted in the following recall:

BY LETTER DATED MARCH 12, 2008, GENERAL MOTORS CORP. (GM) HAS NOTIFIED THE AGENCY THAT IT WILL CONDUCT A SAFETY RECALL (IDENTIFIED BY NHTSA RECALL NUMBER 08V-118) TO ADDRESS A DEFECT IN APPROXIMATELY 207,542 MODEL YEAR (MY) 1997-2003 BUICK REGAL GS AND PONTIAC GRAND PRIX GTP VEHICLES EQUIPPED WITH THE L67 SUPERCHARGED VERSION OF GM'S 3800 SERIES II V6 ENGINE. THE RECALLED REGAL GS VEHICLES WERE BUILT FROM AUGUST 1996 TO JUNE 2003 AND THE GRAND PRIX GTP FROM MARCH 1996 THROUGH JANUARY 2003. ACCORDING TO GM, OIL MAY ESCAPE PAST THE VALVE COVER GASKET ON THE FRONT CYLINDER BANK (CYLINDERS 1-3-5) AND DEPOSIT ONTO HOT EXHAUST SYSTEM COMPONENTS. UNDER CERTAIN CONDITIONS, IT IS POSSIBLE FOR THIS OIL TO IGNITE A SMALL PILOT FLAME, WHICH MAY SPREAD TO THE ADJACENT PLASTIC SPARK PLUG WIRE CHANNEL, THE SPARK PLUG WIRES THEMSELVES, THE PLASTIC ENGINE COVER, AND OTHER UNDER HOOD COMPONENTS. REPORTS INDICATE THIS MOST OFTEN OCCURS ON HIGHER-MILEAGE VEHICLES SHORTLY AFTER THE VEHICLE HAS BEEN DRIVEN AND THEN PARKED. TYPICALLY, THE FIRE WAS DISCOVERED WITHIN 5 TO 15 MINUTES AFTER THE VEHICLE WAS PARKED. DURING THIS TIME WINDOW, UNDER HOOD TEMPERATURES MAY BECOME ELEVATED. SUCH ELEVATED TEMPERATURES COMBINED WITH A LACK OF AIRFLOW THROUGH THE ENGINE COMPARTMENT MAY PERMIT A SMALL PILOT FLAME TO PROPAGATE AND IGNITE OTHER FUEL SOURCES. TO CORRECT THE SAFETY DEFECT, GM WILL INSTALL AN IMPROVED DESIGN FRONT VALVE COVER GASKET AND SPARK PLUG WIRE RETAINER.

The fire origin and circumstances of the fire development in this vehicle match the description of an oil leak having caused this fire.

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CONCLUSION

1. In my opinion, the probable cause of the fire in this vehicle is a result of the defect described in the recall mentioned above.
2. In my opinion, the vehicle manufacturer should be placed on notice as to the existence of this evidence before any destructive examination occurs.

Respectfully Submitted,



Charles C. Roberts, Jr., Ph.D., P.E.

CCR/lr



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ANALYSIS OF A 2000 PONTIAC GTP

Second Report

Insured: Ronald Shipka Enterprises

Claim Number: Seneca 9CCN001

REPORT TO:

Mr. Joe Mazzone

mazzoneinvestigation@prodigy.net

Mazzone & Assoc.

8150 West 111th St. Suite 10

Palos Hills IL 60465

Date of Report: April 23, 2009

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INTRODUCTION

A second inspection was performed on a 2000 Pontiac GTP located at 1301 W Fletcher in Chicago, Illinois. The purpose of the second inspection was to obtain further information so that additional opinions could be offered on the probable cause of a fire that started in the vehicle. This report details the results of the inspection and analysis.

INSPECTION

Figure 1 is a view of the front of the vehicle prior to hood removal.

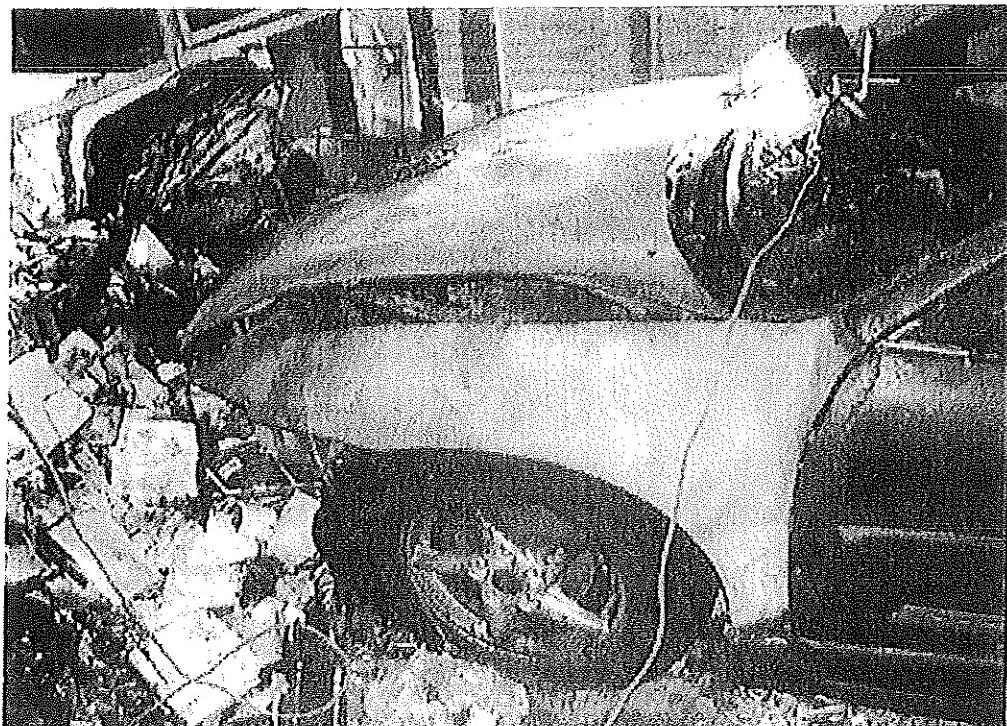


Figure 1

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Figure 2

Figures 2 and 3 show views of the engine compartment with the hood removed. The two hood hinge bolts were removed. The front striker on the hood latching mechanism was cut away.

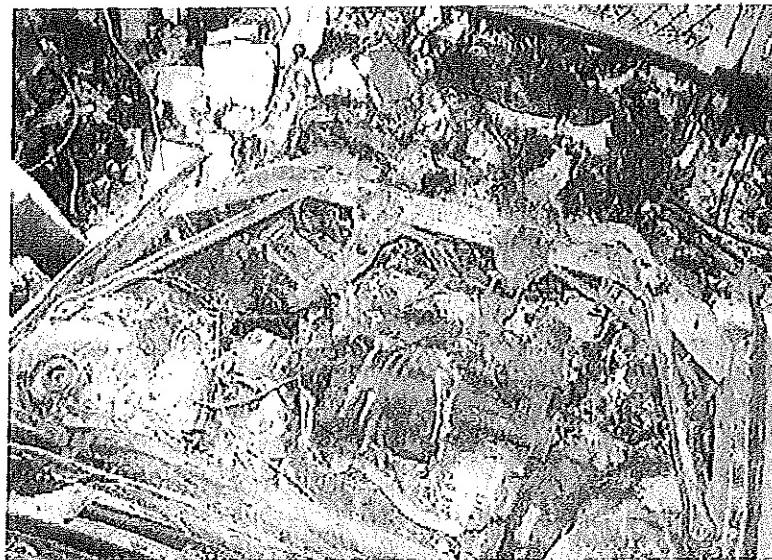


Figure 3

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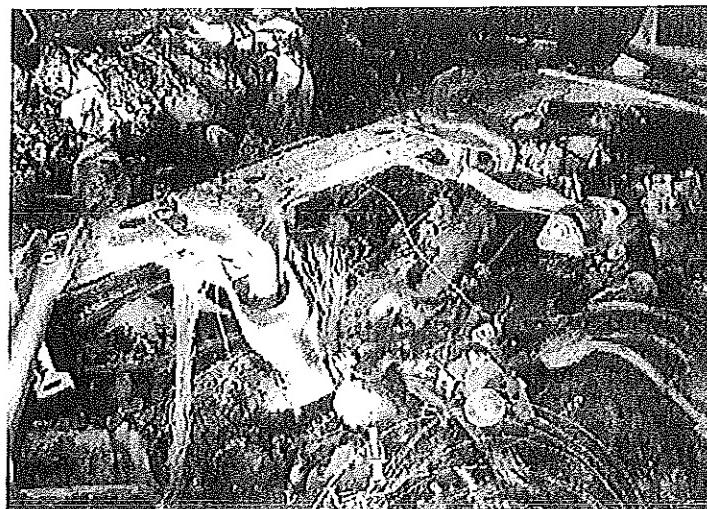


Figure 4

Figure 4 is a close-up of the fire origin area which is in front of the engine. The V pattern at the radiator suggests a fire origin at the front of the engine. Many of the polymer components at the back of the engine showed significantly less damage.

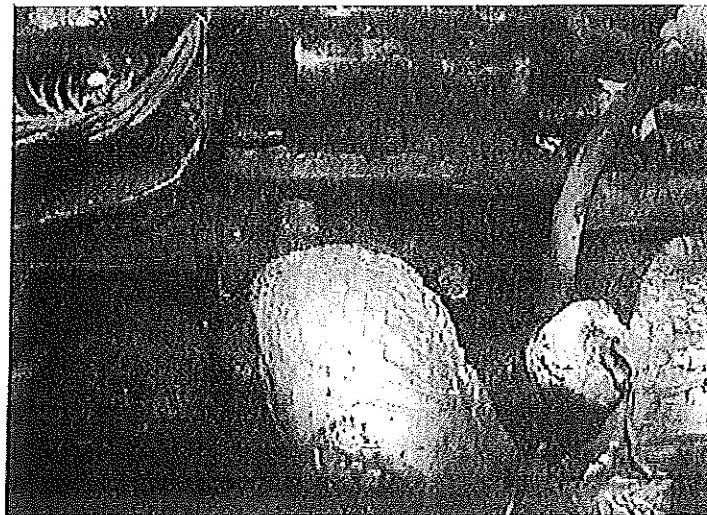


Figure 5

Figures 5 and 6 show views of the interface between the valve cover and the engine. This is the area where oil leakage occurs, according to the General Motors recall shown below. Thermal damage in this area is consistent with oil leakage through the valve cover gasket. Thermal damage inside the engine compartment is consistent with this recall.

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Figure 6

BY LETTER DATED MARCH 12, 2008, GENERAL MOTORS CORP. (GM) HAS NOTIFIED THE AGENCY THAT IT WILL CONDUCT A SAFETY RECALL (IDENTIFIED BY NHTSA RECALL NUMBER 08V-118) TO ADDRESS A DEFECT IN APPROXIMATELY 207,542 MODEL YEAR (MY) 1997-2003 BUICK REGAL GS AND PONTIAC GRAND PRIX GTP VEHICLES EQUIPPED WITH THE L67 SUPERCHARGED VERSION OF GM'S 3800 SERIES II V6 ENGINE. THE RECALLED REGAL GS VEHICLES WERE BUILT FROM AUGUST 1996 TO JUNE 2003 AND THE GRAND PRIX GTP FROM MARCH 1996 THROUGH JANUARY 2003. ACCORDING TO GM, OIL MAY ESCAPE PAST THE VALVE COVER GASKET ON THE FRONT CYLINDER BANK (CYLINDERS 1-3-5) AND DEPOSIT ONTO HOT EXHAUST SYSTEM COMPONENTS. UNDER CERTAIN CONDITIONS, IT IS POSSIBLE FOR THIS OIL TO IGNITE A SMALL PILOT FLAME, WHICH MAY SPREAD TO THE ADJACENT PLASTIC SPARK PLUG WIRE CHANNEL, THE SPARK PLUG WIRES THEMSELVES, THE PLASTIC ENGINE COVER, AND OTHER UNDER HOOD COMPONENTS. REPORTS INDICATE THIS MOST OFTEN OCCURS ON HIGHER-MILEAGE VEHICLES SHORTLY AFTER THE VEHICLE HAS BEEN DRIVEN AND THEN PARKED. TYPICALLY, THE FIRE WAS DISCOVERED WITHIN 5 TO 15 MINUTES AFTER THE VEHICLE WAS PARKED. DURING THIS TIME WINDOW, UNDER HOOD TEMPERATURES MAY BECOME ELEVATED. SUCH ELEVATED TEMPERATURES COMBINED WITH A LACK OF AIRFLOW THROUGH THE ENGINE COMPARTMENT MAY PERMIT A SMALL PILOT FLAME TO PROPAGATE AND IGNITE OTHER FUEL SOURCES. TO CORRECT THE SAFETY DEFECT, GM WILL INSTALL AN IMPROVED DESIGN FRONT VALVE COVER GASKET AND SPARK PLUG WIRE RETAINER.

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CONCLUSION

1. In my opinion, the probable cause of the fire in this vehicle is engine oil leakage onto hot exhaust components.
2. In my opinion, the fire is a result of a defect described in the recall mentioned above.

Respectfully Submitted,



Charles C. Roberts, Jr., Ph.D., P.E.

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